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*Attorneys for Zoho Corporation and
 Zoho Corporation Pvt., Ltd.*

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION**

ZOHO CORPORATION

Plaintiff,

v.

SENTIUS INTERNATIONAL, LLC

Defendant.

SENTIUS INTERNATIONAL, LLC

Counterclaimant,

v.

ZOHO CORPORATION and ZOHO
 CORPORATION PVT., LTD.

Counter-Defendants.

Case No: 4:19-cv-00001-YGR

**DECLARATION OF PHILLIP J. HAACK
 IN SUPPORT OF OPENING CLAIM
 CONSTRUCTION BRIEF OF ZOHO
 CORPORATION AND ZOHO
 CORPORATION PVT., LTD.**

1 I, Phillip J. Haack, declare as follows:

2 1. I am a partner with the law firm of Marton Ribera Schumann & Chang LLP, counsel
3 to Zoho Corporation and Zoho Corporation Pvt., Ltd. in this matter. I have personal knowledge of
4 the facts set forth herein unless otherwise indicated, and if called to testify, I could and would testify
5 competently thereto.

6 2. Exhibit A is a true and correct copy of Order Granting Defendant Flyswat's Motion
7 for Summary Adjudication for Invalidity and for Noninfringement (Dkt. 175), *Sentius Corporation v.*
8 *Flyswat, Inc.*, Case No. C00-02233 SBA (N.D. Cal. August 8, 2002)

9 3. Exhibit B is a true and correct copy of the May 23, 1996 Response to Office Action
10 excerpted from the file history for U.S. Patent No. 5,822,720.

11 4. Exhibit C is a true and correct copy of the January 12, 1996 Response to Office Action
12 excerpted from the file history for U.S. Patent No. 5,822,720.

13 5. Exhibit D is a true and correct copy of the April 2, 1996 Final Rejection excerpted
14 from the file history for U.S. Patent No. 5,822,720.

15 6. Exhibit E is a true and correct copy of excerpted pages from the June 29, 2001
16 Deposition of Marc Bookman in *Sentius Corporation v. Flyswat, Inc.* (N.D. Cal. Case No. C00-
17 02233 SBA).

18 7. Exhibit F is a true and correct copy of excerpted pages from the June 28, 2001
19 Deposition of Marc Bookman in *Sentius Corporation v. Flyswat, Inc.* (N.D. Cal. Case No. C00-
20 02233 SBA).

21 8. Exhibit G is a true and correct copy of U.S. Patent No. 5,146,552 to Cassorla et al.

22 9. Exhibit H is a true and correct copy of Order Re: Construction of Claim 8 of U.S.
23 Patent No. 5,822,720 (Dkt. 107) *Sentius Corporation v. Flyswat, Inc.*, Case No. C00-02233 SBA
24 (N.D. Cal. March 29, 2002)).

25 10. Exhibit I is a true and correct copy of the Joint Claim Construction Chart (Dkt. 73),
26 *Sentius International, LLC v. Blackberry Ltd. and Blackberry Corp.*, Case No. 2:16-cv-773-JRG-RSP
27 (E.D. Tex. July 21, 2017).

28 11. Exhibit J is a true and correct copy of excerpts from The Computer Desktop

1 Encyclopedia, Alan Freedman (2nd ed. 1999) (“lookup table”).

2 12. Exhibit K is a true and correct copy of excerpts from McGraw-Hill, Dictionary of
3 Scientific and Technical Terms (5th ed. 1994) (“look-up table”)

4 13. Exhibit L is a true and correct copy of excerpts from Microsoft Press, Computer
5 Dictionary: The Comprehensive Standard for Business, School, Library, and Home (1991)
6 (“lookup”).

7 14. Exhibit M is a true and correct copy of excerpts from Alan Freedman, The Computer
8 Glossary: The Complete Illustrated Dictionary(7th ed. 1995) (“lookup”).

9 15. Exhibit N is a true and correct copy of Plaintiff Sentius Corporation’s Opening Claim
10 Construction Brief Pursuant to Civil Local Rule 16-11(d)(1) (Dkt. 76), *Sentius Corporation v.*
11 *Flyswat, Inc.*, Case No. C00-02233 SBA (N.D. Cal. Oct. 9, 2001).

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13 I declare under penalty of perjury that the foregoing is true and correct. Executed on this 31st day of
14 January 2020.

15 /s/ Phillip J. Haack
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